PROPOSED RESOLUTION

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

DIVISION OF WATER AND AUDITS **RESOLUTION NO. W-4984**
Water and Sewer Advisory Branch **August 14, 2014**

R E S O L U T I O N

(RESOLUTION W-4984), RESOLUTION APPROVING PROVISIONS IN ACCORDANCE WITH THE CALIFORNIA PUBLIC UTILITIES COMMISION'S AFFILIATE TRANSACATION RULE VII.E TO PREVENT AN INVOLUNTARY SUBSTANTIVE CONSOLIDATION CAUSING A WATER UTILITY BEING PULLED INTO A BANKRUPTCY OF A PARENT OR AFFILIATED COMPANY BY A THIRD-PARTY CREDITOR.

SUMMARY

This Resolution adopts thirteen provisions by which a utility shall financially and from a business function perspective insulate itself from its parent company as required in California Public Utilities Commission Decision (D.) 10-10-019, Rule VII.E, as found in Appendix A of the Decision. The Rule is intended to protect the regulated utility from being involuntarily pulled into a bankruptcy of its parent or affiliate through a petition for substantive consolidation by third-party creditor. As the Commission has stated, the essence of the financial separation rule "is that, regardless of the underlying circumstances, the core functions of the water or sewer utility need to be protected from significant problems elsewhere in the corporate structure." (D. 10-10-019 at p. 67)

Apple Valley Ranchos filed Advice Letter (AL) 163-W; California-American Water Company filed AL 884; California Water Service Company filed AL 2030; Golden State Water Company filed AL 1443-W; Park Water Company filed AL 249-W; San Gabriel Valley Water Company filed AL 395; San Jose Water Company filed AL 425-A, Suburban Water Systems filed AL 282-W; Alisal Water Corporation filed AL 145; Del Oro Water Company filed AL 281; and East Pasadena Water Company filed AL 79 in response to Affiliate Transaction Rule VII.E.

Great Oaks Water Company (Great Oaks) responded on February 7, 2014, stating that it had no parent company and was therefore not subject to the filing requirement. On December 17, 2013, Fruitridge Vista Water Company (Fruitridge Vista) informed the Division of Water and Audits that, based upon the definitions provided in the Affiliate Transaction Rules, it had no parent company or affiliates. Bakman Water Company (Bakman) provided a similar response on March 20, 2014, stating that it did not have a parent or any affiliates based upon the definitions in the Affiliate Transaction Rules.

BACKGROUND

After the events that took place in the energy industry in 2001, including the bankruptcy of PG&E and the failure of Enron, regulated utilities with holding company structures have come under greater scrutiny from regulators to ensure that the regulated utility does not get pulled into a bankruptcy of its parent company. Bankruptcy of a parent or an affiliate has the potential adverse effect of having the utility involuntarily pulled into the bankruptcy to the detriment of the customers of a regulated water utility. When individual regulated water companies have applied to form holding companies, the California Public Utilities Commission (Commission) has required them to follow affiliate transaction rules.[1] These rules generally included few, if any, financial separation provisions. The Commission expanded and formalized the affiliate transaction requirements, including financial separation provisions, for all Class A and Class B water and sewer utilities[2] in Decision (D.) 10-10-019.

The financial separation requirements are found in Attachment A, Rule VII.E, of D.10-10-019 wherein it states:

> Financial Separation. Within three months of the effective date of the decision adopting these Rules, each utility with a parent company shall file a Tier III advice letter proposing provisions that are sufficient to prevent the utility from being pulled into the bankruptcy of its parent company. The process specified by the Advice Letter Filing shall include a verification that the provisions have been implemented and signed by the utility's senior management (e.g., the Chief Executive Officer, Chief Financial Officer, and General Counsel).

D.10-10-019 was adopted by the Commission on October 19, 2010, and required the utilities to file financial separation provisions within three months of the adoption of the rules. On December 21, 2010, the Commission's Executive Director approved a request by the California Water Association and extended the deadline for compliance with the requirements of D.10-10-019 to June 30, 2011.

NOTICE, SERVICE, AND PROTESTS

The various advice letters filed by the utilities were served on their General Order 96-B service lists. General Order 96-B, Rule 4.2 provides that customer notice is required when an advice letter requests higher rates or charges, or more restrictive terms or conditions, than those currently in effect. The financial separation provisions filings do not propose higher rates or charges, or more restrictive terms or conditions, and do not require public notice.

[1] *See, e.g.,* D.02-12-068, D.98-06-068 and D.97-12-01.
[2] I.e., all water and sewer Utilities with 2,001 or more service connections.

The Office of Ratepayer Advocates (ORA) filed a protest on May 11, 2011. The thirteen separation provisions we adopt in this Resolution address many of ORA's articulated concerns. ORA also advocates for an independent director who would sit on the parent's board of directors and who would possess sole authority to determine the interest of the water utility. An independent director would determine, for example, whether the utility should voluntarily be placed into a bankruptcy of the parent. The financial separation provisions we called for in Rule VII.E of the Affiliate Transaction Rules are intended to address the risk of a utility being involuntarily pulled into a bankruptcy of its parent or other affiliate through a substantive consolidation petition by a third-party creditor. ORA's proposed corporate governance provisions are beyond the scope of the financial separation provisions called for in Rule VII.E. If ORA wants to pursue corporate governance provisions addressing the risk of the utility voluntarily being placed into the bankruptcy of its parent, it should petition to re-open the Affiliate Transaction Rulemaking, R.09-04-012, so that these issues can be considered in that context.

DISCUSSION

The majority of the utilities filed financial separation provisions on or around April 1, 2011. At the time D.10-10-019 was adopted, Park Water Company did not have a parent company and hence did not initially file. Subsequently, Park filed financial separation provisions under AL 249 on February 28, 2014 to recognize that Park's stock was acquired by Western Water Holdings, LLC pursuant the D. 11-12-007.

D.10-10-019 did not provide guidelines, minimum standards or other requirements as to the content required for the financial separation provisions, other than requiring a signed statement by an officer of the Utility verifying that the provisions have been implemented. The Division of Water and Audits reviewed all of the filings, and required a supplemental filing from San Jose Water Company for not including the signed verification of implementation by an officer of the Utility. San Jose Water Company filed a supplement to AL 425 on April 11, 2014 that includes a signed verification by its chief executive officer.

Class A Utilities Filing Financial Separation Provisions
Apple Valley Ranchos filed Advice Letter (AL) 163-W on April 1, 2011; California-American Water Company filed AL 884 on April 1, 2011;California Water Service Company filed AL 2030 on May 4, 2011; Golden State Water Company filed AL 1443-W on April 1, 2011; Park Water Company filed AL 249-W on February 28, 2014; San Gabriel Valley Water Company filed AL 395 on April 1, 2011; San Jose Water Company filed AL 425 on April 1, 2011 and supplemental AL 425-A on April 11, 2014;and Suburban Water Systems filed AL 282-W on April 1, 2011.

Class B Utilities Filing Financial Separation Provisions
Alisal Water Corporation filed AL 145 on April 1, 2011; Del Oro Water Company filed AL 281 on March 24, 2011; and East Pasadena Water Company filed AL 79 on August 5, 2013.

The provisions submitted by each utility were similar, although there were some variations. We discuss changes to utility filings to bring them into conformance with the thirteen provisions listed below. These provisions are the minimum financial separation requirements we adopt pursuant to Affiliate Transaction Rule VII.E.

- UTILITY and its parent shall be separate legal entities.
- UTILITY shall observe, in all material aspects, all formalities and procedures required by their Articles of Incorporation, bylaws, and applicable corporate laws regarding the management of its business.
- UTILITY shall correct any known misunderstanding regarding the separate entity of UTILITY, and shall not identify itself as a department or division of its PARENT, but may identify itself as a subsidiary.
- UTILITY may only share (commingle) its assets, funds, liabilities, or business functions with its PARENT as permitted by D.10-10-019, or any other applicable Commission actions.
- UTILITY shall conduct business in its own name as an entity distinct from its PARENT.
- UTILITY shall use stationary and the like bearing its own name on its stationary and other external communications, but may include for identification purposes, a tag line or descriptive information identifying the utility as a member of its Parent's corporate family.
- UTILITY shall maintain separate financial statements showing its assets and liabilities on a stand-alone basis, but these may be included in the consolidated financial statements of its PARENT for financial reporting purposes.
- UTILITY'S accounting records shall be kept in accordance with the applicable Uniform System of Accounts (USOA), or as appropriate, Generally Accepted Accounting Principles (GAAP) and/ or income tax statutes or regulations.
- UTILITY shall not enter into financial transactions with its PARENT that are disallowed in D.10-10-019, or any successor Decisions, except as permitted by the Commission.
- UTILITY shall not issue, secure, or guarantee the debts of its PARENT, except as permitted by the Commission.
- UTILITY shall allocate any shared corporate support and services, pursuant to D.10-10-019 and any other applicable Commission actions.
- UTILITY shall not make any loans to its PARENT, except on terms that are substantially similar to those that would be available on an arm-length basis with unrelated third parties.

- UTILITY shall maintain its assets and liabilities, and books and records thereto, in such a manner that a court is able to ascertain or identify its individual assets and liabilities as separate and distinct from those of its PARENT.

These provisions are intended to reduce the likelihood that a Commission-jurisdictional water utility would be involuntarily pulled into a bankruptcy of its parent or an affiliate through a petition by a third-party creditor of the bankrupt entity seeking to consolidate the assets and liabilities of a debtor (parent or affiliate) with those of a non-debtor (utility).

Courts have used the equitable doctrine of substantive consolidation to disregard the separateness of related entities. Under the doctrine, the assets and liabilities of related entities are consolidated and treated as though held and incurred by a single legal entity. However, different legal entities within a utility holding company structure are likely to have different financial risks such that substantive consolidation can have the deleterious effect of redistributing wealth among the creditors (including utility ratepayers) of the various entities. Judge Henry Friendly articulated the danger of substantive consolidation most succinctly: "Equality among creditors who have lawfully bargained for different treatment is not equity but its opposite." (*Chemical Bank New York Trust Co. v. Kheel*, 369 F.2d 845, 848 (2d Cir. 1966) (Friendly, J., concurring).

A court's power to order substantive consolidation in a bankruptcy case is not specifically stated in the Bankruptcy Code, 11 U.S.C. § 101 et seq. Rather, this power arises from the bankruptcy court's general equitable powers under section 105(a) of the Bankruptcy Code. However, section 105(a) is not a limitless grant of authority to order substantive consolidation. Over time courts have articulated various tests for determining when substantive consolidation is justified to protect the interests of creditors.

The most widely-used test for substantive consolidation is the test developed by the United States Court of Appeals for the Second Circuit in *Union Sav. Bank v. Augie/Restivo Baking Co. (Augie/Restivo)*, 860 F.2d 515, 518 (2d Cir. 1966). In *Augie/Restivo*, the Second Circuit reviewed various factors considered by bankruptcy courts in substantive consolidation opinions and identified two critical factors to be considered in determining whether substantive consolidation is appropriate: (i) whether creditors dealt with the entities as a single economic unit and "did not rely on their separate identity in extending credit," or (ii) whether the affairs of the debtors are so entangled that consolidation will benefit all creditors. *Augie/Restivo*, 860 F.2d at 518. Under this test, the presence of either factor is a sufficient basis to order substantive consolidation.

In 2000, the United States Court of Appeals for the Ninth Circuit adopted the *Augie/Restivo* test and noted that the *Augie/Restivo* approach is "more grounded in substantive consolidation and economic theory [and] more easily applied" than tests used by other courts. *Alexander v. Compton*, 229 F. 3d 750, 766 (9th Cir. 2000).

The thirteen separation provisions we adopt here respond to the two-prongs of the *Augie/Restivo* test: i) creditor reliance on parent or affiliate and utility as a single economic unit and ii) commingling of the utility and parent or affiliate's assets and business functions. The provisions we adopt here, when observed by the regulated water utility, will lessen the possibility of the utility involuntarily being pulled into a bankruptcy of its parent or an affiliate through a petition for substantive consolidation by a third-party creditor of either the parent or an affiliate.

The provisions we adopt mandate a clear separation, both from a financial and business function perspective, between the water utility and other entities in the corporate structure. This will make it more difficult for creditors to show they had contractual expectations that they were dealing with debtor parent company or affiliate and the water utility as one indistinguishable economic entity.

Similarly, we address the commingling concern of the second prong in *Augie/Restivo* by requiring the utility to maintain separate financial statements and maintain its assets and liabilities, and books and records thereto, in such a manner that a court is able to ascertain or identify utility assets and liabilities separate and distinct from those of its parent or an affiliate. We also limit the commingling of utility assets, funds, liabilities, or business functions to further minimize any argument that the assets and business functions are so entangled that consolidation will benefit all creditors.

Class A and Class B Utilities Not Filing Financial Separation Provisions
Three utilities, Great Oaks, Fruitridge Vista, and Bakman, did not file financial separation provisions under Affiliate Transaction Rule VII.E. All three utilities are similarly situated as being individually or family-owned where, in addition to owning the water utility, the individual or family also owns one or more unregulated companies.

Great Oaks
Great Oaks responded on February 7, 2014, stating that it had no parent company and was therefore not subject to the filing requirements. However, Great Oaks does have an unregulated wholly-owned affiliated company, Great Oaks Water LLC, a California limited liability company that owns the real estate and the building housing Great Oaks' management offices, vehicle service bay, and customer service operations. On April 22, 2014, Great Oaks filed Application (A.) 14-04-035 to request Commission authorization to create a holding company structure with a parent corporation owning two stand-alone subsidiaries, Great Oaks and Great Oaks Water LLC. Now that it is proposing to establish a parent company, Great Oaks should either amend A.14-04-035 or incorporate into a settlement in this proceeding to include the financial separation provisions authorized by this Resolution. Great Oaks should include a signed verification by an officer of the Company that the thirteen provisions above have been implemented.

Fruitridge Vista and Bakman

The owner of Fruitridge Vista, Bob Cook, also controls Six Bar C LLC, a real estate holding company. Bob Cook is the sole member of Six Bar C LLC. Fruitridge Vista rents an office and shop space from Six Bar C LLC. Fruitridge Vista also indicates that the water utility is owned 100% by Cook Endeavors, a California "S" corporation, doing business as Fruitridge Vista Water Company. The board of Cook Endeavors consists of Bob Cook and his mother, Jane Cook. In its response to inquiries from the Division of Water and Audits (DWA), Fruitridge Vista states that it interprets the term "entity" within the definition of an affiliate in Rule II.E to refer to a "corporate entity," and not to an individual person.

Bakman is similarly situated in that the family that owns and controls the regulated utility also owns or controls seven unregulated businesses, mostly real estate holding companies. Bakman argues that the water utility does not have a parent company, and thus is not required to file financial separation provisions pursuant to the requirement in Rule VII.E.

Fruitridge Vista and Bakman are correct that neither has a parent company and that, under Rule VII.E, they are not required to file financial separation provisions. While smaller family-owned utilities like Fruitridge Vista and Bakman do not need to comply with the filing requirements in Rule VII.E of D.10-10-019, they do present potential concerns of having the regulated utility pulled into a bankruptcy of an unregulated family-owned business through a substantive consolidation petition by a third-party creditor.

Investments in real estate can be speculative and, depending on the nature of the investment, have the potential to lose substantial value due to poor market conditions. Risky real estate investments or other non-regulated activities could subject the owner to bankruptcy and adversely impact the regulated water utility and its ratepayers. Rule VIII.B of Appendix A to D.10-10-019 requires the utility and its affiliated companies to provide the Commission, its staff, and its agents access to all relevant books and records. To ensure that the unregulated operations do not adversely impact either the regulated water utility or its ratepayers, DWA should, as part of its general rate case reviews for Fruitridge Vista and Bakman, review the organizational structure between the regulated and unregulated operations of these family-owned businesses. In the context of the general rate case reviews, DWA should propose any provisions it believes are necessary to insulate the utility and its ratepayers from the risks presented by unregulated, family-owned operations. Fruitridge Vista currently has a general rate case (Advice Letter No. 105) pending before the Commission where DWA should review and propose changes, if necessary, to address risks affecting utility ratepayers from operation of unregulated family-owned businesses.

Necessary Supplements to Filed Advice Letters

A number of utilities filed advice letters incorporating proposed separation provisions which will need to be supplemented to bring each utility's proposed separation

provisions into conformance with those adopted in this Resolution. All supplemental advice letters should include verification, signed by a senior officer of the utility responsible for implementing the financial separation provisions, that the provisions have been implemented.

Park Water Company should supplement AL 249 to add the provision that the utility shall not make any loans to its parent, except on terms that are substantially similar to those that would be available on an arms-length basis with unrelated third parties. San Gabriel Valley Water Company should supplement AL 395 to add the provision that the utility shall correct any known misunderstanding regarding that the utility is a separate entity, and the utility shall not identify itself as a department or division of its parent, but may identify itself as a subsidiary.

San Jose Water Company should supplement AL 425-A to add the provision that the utility shall observe, in all material aspects, all formalities and procedures required by their Articles of Incorporation, bylaws, and applicable corporate laws regarding the management of its business.

California Water Service Company should supplement AL 2013 to add the provision that the utility shall not issue, secure, or guarantee the debts of its parent, except as permitted by the Commission. Cal Water should also add the provision that the utility shall not make any loans to its parent, except on terms that are substantially similar to those that would be available on an arms-length basis with unrelated third parties. Finally, East Pasadena Water Company should file a supplement to AL 79 to add the following provisions: 1) utility shall not issue, secure, or guarantee the debts of its parent except as permitted by the Commission; and 2) utility shall not make any loans to its parent, except on terms that are substantially similar to those that would be available on an arms-length basis with unrelated third parties.

COMMENTS

Public Utilities Code section 311(g)(1) provides that resolutions generally must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission.

Accordingly, this draft resolution was mailed to utilities and ORA for comment on July 15, 2014. No comments were received.

FINDINGS AND CONCLUSIONS

1. Risky business activities by the parent company of a regulated water utility can cause the utility to be pulled into bankruptcy of the parent or an affiliate through a petition for substantive consolidation by a third-party creditor of the bankrupt entity.
2. In Decision (D.) 10-10-019, the California Public Utilities Commission (Commission) adopted affiliate transaction requirements for Utilities.
3. D.10-10-019 Attachment A, Section VII.E contains rules for Class A and Class B water utilities to file financial separation provisions.
4. The following Class A Utilities filed financial separation provisions: Apple Valley Ranchos filed Advice Letter (AL) 163-W on April 1, 2011; California-American Water Company filed AL 884 on April 1, 2011; California Water Service Company filed AL 2030 on May 4, 2011; Golden State Water Company filed AL 1443-W on April 1, 2011; Park Water Company filed AL 249-W on February 28, 2014; San Gabriel Valley Water Company filed AL 395 on April 1, 2011; San Jose Water Company filed AL 425 on April 1, 2011; and Suburban Water Systems filed AL 282-W on April 1, 2011.
5. The following Class B Utilities filed financial separation provisions: Alisal Water Corporation filed AL 145 on April 1, 2011; Del Oro Water Company filed AL 281 on March 24, 2011; and East Pasadena Water Company filed AL 79 on August 5, 2013.
6. General Order 96-B, Rule 4.2 states that no notice is required for advice letters that do not request either higher rates or charges, or more restrictive terms or conditions, than those currently in effect.
7. The Office of Ratepayers' proposed corporate governance provisions are beyond the scope of the financial separation provisions called for in Rule VII.E.
8. Great Oaks Water Company, a Class A Utility, responded on February 7, 2014, stating that it had no parent company and was therefore not subject to the filing requirements.
9. On April 22, 2014 Great Oaks Water Company filed Application (A.) 14-04-035 to request Commission authorization to create a holding company structure with a parent corporation owning two stand-alone subsidiaries, Great Oaks Water Company and Great Oaks Water LLC.
10. Great Oaks should either amend A.14-04-035 or incorporate into a settlement in this proceeding to include the financial separation provisions authorized by this Resolution. Great Oaks should include a signed verification by an officer of the Company that the thirteen provisions above have been implemented.
11. Fruitridge Vista Water Company (Fruitridge Vista) and Bakman Water Company (Bakman) do not have a parent company as defined in D.10-10-019 and are therefore not subject to the filing requirements of Affiliate Transaction Rule VII.E.

12. Any review of a family-owned business organization structure needed to mitigate a potential risk posed by the real estate holdings of Fruitridge Vista and Bakman can be performed as part of the Division of Water and Audits review of general rate case advice letters for these entities.
13. The Division of Water and Audits should review the risk posed by the unregulated, family-owned holdings on Fruitridge Vista's ratepayers in the pending general rate case in Advice Letter No. 105.
14. The financial separation provision filings were reviewed by the Commission's Division of Water and Audits for completeness and content.
15. The thirteen financial separation provisions adopted in this Resolution satisfy the intent of D.10-10-019, Attachment A, Section VII.E.
16. California Water Service Company, San Gabriel Valley Water Company, San Jose Water Company, and East Pasadena Water Company should file supplements to their advice letters amending the separation provisions to bring each utility's separation provisions into conformance with those adopted in this Resolution.
17. All supplemental advice letters should include verification, signed by a senior officer of the utility responsible for implementing the financial separation provisions, that the provisions have been implemented.
18. This Resolution was circulated for public comment.

THEREFORE, IT IS ORDERED THAT:

1. The financial separation advice letters filed by the following Class A and Class B water utilities are adopted: Alisal Water Corporation's Advice Letter 145; Del Oro Water Company's Advice Letter 281; California American Water Company's Advice Letter 884; Golden State Water Company's Advice Letter 1443; and Suburban Water Systems' Advice Letter 282.
2. Park Water Company shall supplement Advice Letter 249 to add the provision that the utility shall not make any loans to its parent, except on terms that are substantially similar to those that would be available on an arm-length basis with unrelated third parties. The supplement is to be filed no later than 30 days after the effective date of this Resolution. The supplement shall include verification, signed by a senior officer of the utility responsible for implementing the financial separation provisions, that the provision has been implemented.
3. San Gabriel Valley Water Company shall supplement Advice Letter 395 to add the provision that the utility shall correct any known misunderstanding regarding that the utility is a separate entity, and the utility shall not identify itself as a department or division of its parent, but may identify itself as a subsidiary. The supplement is to be filed no later than 30 days after the effective date of this Resolution. The supplement shall include verification, signed by a senior officer of the utility responsible for implementing the financial separation provisions, that the provision has been implemented.
4. San Jose Water Company shall supplement Advice Letter 425-A to add the provision that the utility shall observe, in all material aspects, all formalities and procedures required by their Articles of Incorporation, bylaws, and applicable corporate laws regarding the management of its business. The supplement is to be filed no later than 30 days after the effective date of this Resolution. The supplement shall include verification, signed by a senior officer of the utility responsible for implementing the financial separation provisions, that the provision has been implemented.
5. California Water Service Company shall supplement Advice Letter 2013 to add the provision that the utility shall not issue, secure, or guarantee the debts of its parent, except as permitted by the Commission. Cal Water should also add the provision that the utility shall not make any loans to its parent, except on terms that are substantially similar to those that would be available on an arm-length basis with unrelated third parties. The supplement is to be filed no later than 30 days after the effective date of this Resolution. The supplement shall include verification, signed by a senior officer of the utility responsible for implementing the financial separation provisions, that the provisions have been implemented.

6. East Pasadena Water Company shall file a supplement to Advice Letter 79 to add the following provisions: 1) utility shall not issue, secure, or guarantee the debts of its parent except as permitted by the Commission; and 2) utility shall not make any loans to its parent, except on terms that are substantially similar to those that would be available on an arm-length basis with unrelated third parties. The supplement is to be filed no later than 30 days after the effective date of this Resolution. The supplement shall include verification, signed by a senior officer of the utility responsible for implementing the financial separation provisions, that the provisions have been implemented.
7. Great Oaks shall either amend A.14-04-035 or incorporate into a settlement in this proceeding to include the thirteen financial separation provisions authorized by this Resolution. The thirteen financial separation provisions shall include verification, signed by a senior officer of the utility responsible for implementing the financial separation provisions, that the provisions have been implemented.
8. This resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on August 14, 2014; the following Commissioners voting favorably thereon:

Paul Clanon
Executive Director

CERTIFICATE OF SERVICE

I certify that I have by either electronic mail or postal mail, this day, served a true copy of Proposed Resolution No. W-4987 on all parties in these filings or their attorneys as shown on the attached lists.

Dated July 15, 2014, at San Francisco, California.

/s/ JENNIFER PEREZ
Jennifer Perez

Parties should notify the Division of Water and Audits, Fourth Floor, California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, CA 94102, of any change of address to ensure that they continue to receive documents. You must indicate the Resolution number on which your name appears.

SERVICE LIST

Apple Valley Ranchos Water Company
Attn: Leigh K. Jordan
PO Box 7002
Downey, CA 90241

California-American Water Company
Attn: David P. Stephenson
4701 Beloit Dr.
Sacramento, CA 95838

California Water Service Company
Attn: Paul Townsley
1720 North First Street
San Jose, CA 95112

Golden State Water Company
Attn: Keith Switzer
630 East Foothill Blvd.
San Dimas, CA 91773

Great Oaks Water Company
Attn: Timothy Guster
Po Box 23490
San Jose, CA 95153

Park Water Company
Attn: Leigh K. Jordan
Po Box 7002
Downey, CA 90241

San Gabriel Valley Water Company
Attn: Michael Whitehead
Po Box 6010
El Monte, CA 91734

San Jose Water Company
Attn: Palle Jensen
110 West Taylor St.
San Jose, CA 95110

Suburban Water Systems
Attn: Robert L. Kelly
1325 N. Grand Ave., Suite 100
Covina, CA 91724

Alisal Water Corporation
Attn: Thomas R. Adcock
249 Williams Rd.
Salinas, CA 93905

Bakman Water Company
Attn: Shaymus Bakman,
Po Box 7965
Fresno, CA 93747

Del Oro Water Co., Inc.
Attn: Robert S. Fortino
Drawer 5172
Chico, Ca 95927

East Pasadena Water Company
Attn: Lawrence Morales
3725 East Mountain View Avenue
Pasadena, CA 91107

Fruitridge Vista Water Company
Attn: Robert C. Cook Jr.
Po Box 959
Sacramento, CA 95814

Office of Ratepayer Advocates
CA Public Utilities Commission
ora@cpuc.ca.gov